



LAW OFFICE OF
DAVIS INABNIT, JR., LLC

1004 Buck Street, Conway, SC 29526

843-248-2089 Phone | 843-248-9653 Fax | davis@inabnitlaw.com

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
101 Executive Center Dr., Suite 100
Columbia, SC 29210

Via e-filing and email to:

david.stark@psc.sc.gov;

jpittman@regstaff.sc.gov

October 17, 2018

**RE: Accel Moving & Storage LLC; 2018-229-T
Request for Extension to Comply with Order**

Dear Sir(s)/Madam(s):

Please find attached hereto a Transportation Coversheet regarding Accel Moving and Storage LLC's Request for Extension to Comply with Order relating to the Commission's order/instructions for publication of the Clerk's Office Notice of Filing. The basis for this request is set forth below.

On July 11, 2018 I filed on behalf of Excel Moving & Storage LLC an Application for Class E Certificate for Household Goods. Following the electronic filing of the Application, on July 18 the Commission office published on its e-filing website the Clerk's Office Notice of Filing for the above referenced docket number.

Initially I did not receive the Notice of Filing or the instructional letters which were filed on July 18th, due to the e-mail notice going directly into my junk e-mail; which I subsequently checked on July 23rd. Upon my receipt of the Notice of Filing and various letters containing the notice requirements and instructional letter from the Commission, I contacted a member of the staff at the Public Service Commission to inquire as to questions I had regarding the procedures for the application process; including specifics for the notice requirements with regards to which newspapers the publication could be run. After contacting the Horry Independent; which I normally use locally for publication purposes, I confirmed that they or their other publications did not cover the entire 3 county region. I also attempted to contact the Sun News which has a larger distribution base to see whether it would satisfy the Commission's notice requirements, but after multiple attempts to contact the Sun News, they never returned my call. On the week after receiving the notice on July 23rd I was out of the office. Unfortunately, due to a miscommunication by me, my staff contacted the State newspaper to get rates to run the notice; but did not actually run the notice.

Upon my return to the office after August 1st, I became aware that the notice was not run within the August 1st deadline. After missing the deadline, I contacted the staff at the Commission to inquire as to whether a late notice would be permissible. It was explained that they did not think it would not be a problem; therefore, I requested that a new or amended Clerk's Office Notice of Filing be provided to modify the time frames which were provided in the original Notice of Filing. I did not receive an amended Notice of Filing prior to being contacted by staff from either the Commission or Office of Regulatory Staff regarding the rescheduling of the prehearing conference due to the cancellations and closures following Hurricane Florence which flooded my client's facility and my home. At the time of rescheduling the prehearing conference, I again requested that a new/amended Notice of Filing to be issued as I did not feel that I was able to modify the existing notice and needed the dates to include in the same. At the prehearing conference which was held this morning, I again advised both counsel for the Commission and Office of Regulatory Staff of the need for a revised Notice of Filing or permission to modify the dates so that the Notice of Filing could be published.

In light of the foregoing, I would respectfully request the ability to immediately publish in the state newspaper a new and/or amended Clerk's Office Notice of Filing with amended dates or authority to amend the dates in the notice to be provided to the paper for publication. If the Commission and Office of Regulatory Staff approve of this request, notice could still be provided prior to the hearing scheduled for October 24.

Furthermore, I'm not aware of any prejudice this would cause to the public in general as any concerned party(ies) in the industry were notified immediately upon the initial filing of the application. To support this statement, I was contacted by the principle of another moving company in this area whom I personally know. He informed me that he received notice of the filing simply inquired as to who the application was for. He did not express any concern over the application at that time.

I would like to thank you in advance for your consideration of this request.

With warmest regards, I remain yours very truly

Sincerely,

Law Office of Davis Inabnit, Jr.


Davis Inabnit, Jr.

Cc: client